

### **REMARKS**

Claim 1 has been amended. Accordingly, Claims 1-20 are pending.

#### **I. Amendments:**

Claim 1 was amended to correct a typographical error. As such, no new matter has been added.

#### **II. The invention:**

The claimed invention is directed to an optical connector that includes a separate shutter unit assembly that is received by and fitted within a connector housing. This allows for manufacturing a shutter for light interception that is more compact and cost effective. The housing can also contain a separate shielding member and an inner piece. A connector employing these features can guarantee positional accuracy and stability at the vicinity of the optical connection and can result in improvements of compactness of the connector housing and an increase in density of the connector fitting hole. These internal components of the connector allow for improvements in electromagnetic radiation shielding capability and dust protection in the vicinity of the optical connection.

#### **III. Rejections:**

On page 2, section 1 of the Office Action, claims 12 and 20 were rejected under 35 U.S.C. §102(b) as being anticipated by published U.S. Patent No. 6,076,975 to Roth (hereinafter "Roth").

Roth discloses a fiber optic connector assembly that includes both a single shutter member 42 and a set of dual shutter members 44. The Office Action indicates that Roth discloses a optical connector comprising an inner piece 38 having an aperture into which a ferrule 74 at the tip of a connector 18 can be inserted and having engagement claws with projections that engage with a connector and the connectors mating grooves 114 on both sides of the connector.

Applicants respectfully disagree and submit that nowhere does Roth disclose an optical connector that includes an inner piece as claimed.

A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. *Verdegaal Bros. V. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). The identical invention must be shown in as complete detail as is contained in the claim. *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913,1920 (Fed. Cir. 1989).

Nowhere does Roth disclose an inner piece as claimed in claim 12, which includes an inner main section which is formed with an aperture into which a ferrule can be inserted and which is “located within the connector housing.” It is respectfully submitted that the purported “inner piece” 38, as disclosed by Roth, actually forms the walls of the connector housing itself and is not “located within the connector housing” as required by claim 12.

Therefore, as Roth does not disclose each and every element as set forth in the present claims 12 and 20 and does not show the identical invention in as complete detail as claimed, it is respectfully submitted that the Roth reference cannot anticipate the present claims. See *Verdegaal*, 814 F.2d at 631 and *Richardson*, 868 F.2d at 1236.


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Accordingly, it is respectfully requested that the rejection of claims 12 and 20 under 35 U.S.C. § 102(b), in view of Roth, be withdrawn.

### CONCLUSION

Accordingly, Applicants respectfully submit that the application as amended, including claims 1-20, is now in proper form for allowance, which action is earnestly solicited. If resolution of any remaining issue is required, it is respectfully requested that the Examiner contact Applicants' undersigned attorney at the telephone number provided below.

Respectfully submitted,



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